

STATE OF SOUTH CAROLINA
COUNTY OF OCONEE

FILED OCONEE COUNTY, SC
MELISSA C. BURTON
CLERK OF COURT

) IN THE COURT OF COMMON PLEAS
) TENTH JUDICIAL CIRCUIT
) CIVIL ACTION NO. 2025 CP-3701075

Synchrony Bank

PLAINTIFF

2026 JUN -8 A 8:47

) MOTION FOR RULE 54(b)
) CERTIFICATION
)

Julie Dalen

DEFENDANT

RECEIVED
JUN 11 2026

SC Court of Appeals

DEFENDANT'S MOTION FOR RULE 54(b) CERTIFICATION

Defendant, Julie Dalen, Pro Per, respectfully moves this Court to certify its order denying Defendant's Motion to Dismiss for Lack of Personal Jurisdiction as a final judgment under Rule 54(b) SCRPC, for purposes of immediate appeal.

I. INTRODUCTION

The Court has issued an order resolving Defendant's jurisdictional challenge including findings regarding service of process under Rule 4, SCRPC and the Court's exercise of personal jurisdiction.

That ruling disposes of defendant's threshold defense to the Court's authority to proceed.

II. LEGAL STANDARD

Rule 54(b), SCRPC permits a trial court to certify a judgment as final where:

1. Multiple claims or parties are present, and
2. The Court expressly determines there is no just reason for delay of appellate review.

Certification is appropriate where early appellate review will promote judicial economy and avoid unnecessary litigation.

III. ARGUMENT

The Court's ruling on personal jurisdiction is dispositive of Defendant's threshold defense to the action.

If the appellate court determines that service of process was defective, the entire proceeding may be rendered void for lack of jurisdiction. Accordingly, immediate appellate review may conserve judicial resources by resolving a dispositive threshold issue at the outset.

Certification will avoid unnecessary litigation costs and ensure that the matter proceeds only if jurisdiction has been properly established.

IV. REQUEST FOR RELIEF

Defendant respectfully requests that this court:

1. Certify its order denying Defendant's Motion to Dismiss for Lack of Personal Jurisdiction as a final judgment under Rule 54(b), SCRCP; and
2. Grant such further relief as the Court deems just and proper.

PLAINTIFF

IN THE COURT OF COMMON PLEAS
TENTH JUDICIAL CIRCUIT
CIVIL ACTION NO. 2025 CP-3701075

FILED OCONEE COUNTY, SC
MELISSA C. BURTON
CLERK OF COURT

**CERTIFICATE OF SERVICE
FOR**

2026 JUN -8 DEFENDANT'S MOTION FOR RULE
54(b) CERTIFICATION

Julie Dalen

DEFENDANT

CERTIFICATE OF SERVICE FOR DEFENDANT'S MOTION FOR RULE 54 (B) CERTIFICATION

I, Julie Dalen, hereby certify that a copy of the foregoing was sent to Plaintiff by First Class mail, addressed to: Lloyd & McDaniel, PLC at 233 N. Main Street, Suite 7, Greenville, SC 29601.

By:

Julie Dalen
108 Jessie Road
Westminster, SC 29693
(864) 647-4705

RECEIVED

JUN 11 2026

SC Court of Appeals

DATED this 6th day of June 2026

To:

Joseph E. Brown and Adam S. Tesh, Attorneys for Plaintiff
Lloyd & McDaniel, PLC at 233 N. Main Street, Suite 7, Greenville, SC 29601
(800) 291 – 5144

Respectfully Submitted,

Julie Dalen

Julie Dalen, Pro Per
108 Jessie Road
Westminster, SC 29693
(864) 647-4705

DATED this 6th day of June, 2026